



# Correspondence Management System

Control Number: AX-13-000-5157

Printing Date: May 07, 2013 03:15:45



## Citizen Information

**Citizen/Originator:** McGroarty, Daniel

**Organization:** American Resources Policy Network

**Address:** 1701 Pennsylvania Avenue, NW, Washington, DC 20009

**Constituent:** N/A

**Committee:** N/A

**Sub-Committee:** N/A

## Control Information

**Control Number:** AX-13-000-5157

**Alternate Number:** N/A

**Status:** Closed

**Closed Date:** May 7, 2013

**Due Date:** N/A

**# of Extensions:** 0

**Letter Date:** May 6, 2013

**Received Date:** May 7, 2013

**Addressee:** Senators Barbara Boxer/David  
Vitter

**Addressee Org:** U.S. Senate

**Contact Type:** EML (E-Mail)

**Priority Code:** Normal

**Signature:** SNR-Signature Not Required

**Signature Date:** N/A

**File Code:** 401\_127\_a General Correspondence Files Record copy

**Subject:** Daily Reading File - Concerns about the EPA's use of scientific research; Stratus Consulting  
admitting to filing a falsified research report

**Instructions:** For Your Information -- No action required

**Instruction Note:** N/A

**General Notes:** N/A

**CC:** OAR - Office of Air and Radiation -- Immediate Office  
OCIR - Office of Congressional and Intergovernmental Relations  
OEAAE - Office of External Affairs and Environmental Education  
OGC - Office of General Counsel -- Immediate Office  
OW - Office of Water -- Immediate Office

## Lead Information

**Lead Author:** N/A

### Lead Assignments:

Assigner	Office	Assignee	Assigned Date	Due Date	Complete Date
No Record Found.					

## Supporting Information

**Supporting Author:** N/A

### Supporting Assignments:

Assigner	Office	Assignee	Assigned Date
Jacqueline Leavy	OEX	ORD	May 7, 2013

## History

Action By	Office	Action	Date
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# AMERICAN RESOURCES

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POLICY NETWORK

1701 Pennsylvania Ave NW, Suite 300 Washington, DC 20009 • 301-951-7005

May 6, 2013

The Honorable Senator Barbara Boxer  
Chair, Senate Committee on Environment and Public Works  
112 Hart Senate Office Building  
United States Senate  
Washington, DC 20510

The Honorable Senator David Vitter  
Ranking Member, Senate Committee on Environment and Public Works  
516 Hart Senate Office Building  
Washington, DC 20510

Dear Senator Boxer and Senator Vitter:

I'm writing to bring to your attention to some concerns about the Environmental Protection Agency's use of scientific research. For more than 40 years, American citizens have relied on the EPA to help protect our environment and our health through unbiased, data-driven policies and regulations based on the application of sound science. I was therefore troubled when I recently learned that Stratus Consulting, an environmental research firm with a longstanding relationship with the EPA, has admitted to filing a falsified research report.

The issue concerns environmental assessments that Stratus Consulting performed in a legal case brought against Chevron in an Ecuadorian court. In a letter publicly available on the EPA website that was uncovered as the result of a FOIA request dated April 3, 2012 to then-EPA Administrator Lisa Jackson, Joshua Lipton, President and CEO of Stratus Consulting, described the company's role as follows (see attached):

*Stratus Consulting was hired to provide scientific assistance to attorneys representing a group of rural and indigenous Ecuadorians in their lawsuit in Ecuador against Chevron for large-scale environmental pollution damage in the Amazon rainforest. In the course of our work, we conducted technical analyses of Chevron's oilfield operations in Ecuador, the environmental contamination caused by those operations, and the resulting environmental impacts. Work on the project was similar to the type of environmental assessments Stratus Consulting has routinely performed for its U.S. federal and state government clients of the past two decades.*

When Chevron discovered that Stratus Consulting and others had falsified these assessments – which were used to win a \$19 billion judgment in the Ecuadorian court – Chevron sued Stratus Consulting and others in a U.S. federal court, accusing the firm of racketeering and fraud.<sup>1</sup>

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<sup>1</sup> <http://m.prnewswire.com/news-releases/statement-of-stratus-consulting-regarding-chevron-countersuit-115216989.html>

# AMERICAN RESOURCES

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POLICY NETWORK

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Just a few weeks ago, Stratus published a 28-page affidavit accompanied by 16 pages of individual declarations disavowing the research it had produced in Ecuador.

In a story that was widely covered by the media, including the *New York Times*,<sup>2</sup> Stratus Consulting Executive Vice President Douglas Beltman stated in his declaration for the affidavit, “I disavow any and all findings and conclusions in all of my reports and testimony on the Ecuador project.”<sup>3</sup> Ann Maest, Managing Scientist for Stratus Consulting, in her own declaration, stated, “I now believe that the damages assessment in the Cabrera Report and Cabrera Response is tainted. Therefore, I disavow any and all findings and conclusions in all of my reports and testimony on the Ecuador Project.”<sup>4</sup>

As President of American Resources Policy Network, a non-partisan organization focused on data-driven policies regarding access to domestic mineral and metal resources, the admissions made by Stratus Consulting greatly concern me. In addition to the disclosures made by Mr. Lipton in his letter to Ms. Jackson, publicly available records show that the EPA has hired Stratus Consulting as a subcontractor for an array of environmental consulting projects, with total taxpayer-funded contract values in the tens of millions of dollars.<sup>5</sup> The EPA has also cited research reports – both peer-reviewed studies and non-validated white papers – authored or co-authored by employees of Stratus Consulting.

Most recently, on Friday, April 26, the EPA released the second draft of “An Assessment of Potential Mining Impacts on Salmon Ecosystems of Bristol Bay, Alaska” (hereafter Bristol Bay Assessment), outlining the potential impacts of a hypothetical mine to develop the Pebble Deposit, which could prove to be the largest copper resource in American history.<sup>6</sup>

The Bristol Bay Assessment cites two documents – Kuipers et al. (2006)<sup>7</sup> and Wobus et al. (2012)<sup>8</sup> – authored by Ms. Maest, Managing Scientist for Stratus Consulting. These documents are cited a total of 11 times in the text of the Bristol Bay Assessment, and seven of those are in conjunction with Stratus Consulting (see attached).

To be clear, these are not peer-reviewed studies; they are non-validated white papers. Kuipers et al. (2006) was funded by Earthworks, which the white paper itself describes as:

*A non-profit organization dedicated to protecting communities and the environment from the destructive impacts of mineral development in the U.S. and worldwide. The organization's mission is to work with communities and grassroots groups to reform government policies,*

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<sup>2</sup> [http://www.nytimes.com/2013/04/13/business/research-recanted-in-oil-pollution-case-in-ecuador.html?\\_r=0](http://www.nytimes.com/2013/04/13/business/research-recanted-in-oil-pollution-case-in-ecuador.html?_r=0)

<sup>3</sup> <http://www.scribd.com/doc/135569522/Declaration-of-Douglas-Beltman-former-top-environmental-expert-for-Ecuadorians-suing-Chevron>

<sup>4</sup> <http://www.scribd.com/doc/135573650/Declaration-of-Ann-Maest-of-Stratus-Consulting>

<sup>5</sup> <http://www.epa.gov/oam/ptod-ek1rptv.pdf>

<sup>6</sup> <http://cfpub.epa.gov/ncea/bristolbay/recordisplay.cfm?deid=242840>

<sup>7</sup> [http://ofinpub.epa.gov/eims/eimscomm.getfile?p\\_download\\_id=513581](http://ofinpub.epa.gov/eims/eimscomm.getfile?p_download_id=513581)

<sup>8</sup> [http://ofinpub.epa.gov/eims/eimscomm.getfile?p\\_download\\_id=513585](http://ofinpub.epa.gov/eims/eimscomm.getfile?p_download_id=513585)

# AMERICAN RESOURCES

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## POLICY NETWORK

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*improve corporate practices, influence investment decisions and encourage responsible materials sourcing and consumption.*<sup>9</sup>

This issue of unbiased research was raised with the EPA, which then conducted its own peer-review of the two white papers co-authored by Ms. Maest in the time between the first and second drafts of the Bristol Bay Assessment. This was to ensure that the white papers were, “of sufficient scientific quality and credibility to be incorporated into the second external review draft of the Bristol Bay Assessment.”<sup>10</sup>

Regarding Kuipers et al. (2006), the first peer-reviewer listed is David A. Atkins, former Managing Scientist for Stratus Consulting.<sup>11</sup> Kuipers et al. (2006) references two publications by Mr. Atkins, including one that he co-authored with Ms. Maest. Perhaps, having been tasked with peer-reviewing work citing his own research and that of his co-author, it is no surprise that Mr. Atkins affirmed the scientific integrity of Kuipers et al. (2006), and concluded that it is fit to include in the Bristol Bay Assessment. It is worth noting that Mr. Atkins is also a peer-reviewer for the Bristol Bay Assessment.<sup>12</sup>

It is also important to note that in addition to the EPA, Stratus Consulting and Ms. Maest have been hired by numerous advocacy groups, including some explicitly opposed to the development of the Pebble Deposit. For example, one such group, the Center for Science in Public Participation (CSP2), states on its website that, “Since 2007 CSP2 has been providing technical support to a loose coalition of groups opposed to the proposed [Pebble] mine ... CSP2 also utilized consultants ... Ann Maest, Ph.D., and Cam Wobus, Ph.D., from Stratus Consulting to provide technical support on geochemistry and hydrology.”<sup>13</sup>

The Bristol Bay Assessment is particularly problematic because it is being conducted before a mine permitting process has been initiated, and it relies too heavily on environmental impact based in part on research from Stratus Consulting and Ms. Maest – which have now admitted in U.S. federal court proceedings to having presented falsified research.

My organization educates policymakers, decision-makers and the general public on the economic importance of metals like copper for manufacturing, defense, hi-tech and green-tech applications, and we're concerned that, in the case of Pebble, the EPA could stop what may be the largest-ever domestic copper resource before the permitting process has begun – and based on research presented by authors who have admitted falsifying their findings in other environmental studies.

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<sup>9</sup> [http://efinpub.epa.gov/eims/eimscomm.getfile?p\\_download\\_id=51358](http://efinpub.epa.gov/eims/eimscomm.getfile?p_download_id=51358)

<sup>10</sup> [http://efinpub.epa.gov/nea/bristolbay\\_recordisplay.cfm?deid=182065](http://efinpub.epa.gov/nea/bristolbay_recordisplay.cfm?deid=182065)

<sup>11</sup> [http://efinpub.epa.gov/eims/eimscomm.getfile?p\\_download\\_id=513568](http://efinpub.epa.gov/eims/eimscomm.getfile?p_download_id=513568)

<sup>12</sup> <http://www.pebblescience.org/pdfs/Final-Peer-Review-Report-Bristol-Bay-1.pdf>

<sup>13</sup> <http://www.csp2.org/projects>

# AMERICAN RESOURCES

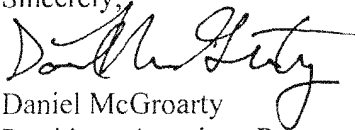
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POLICY NETWORK

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The EPA plays a key role in ensuring that mineral extraction projects are environmentally sound – a role that rests on the agency's reputation for relying on unbiased and credible scientific research being beyond reproach. We therefore hope that in light of the facts outlined above, the EPA will withdraw Ms. Maest's research from the Bristol Bay Assessment. Given the recent admissions made by Stratus Consulting and its researchers, we also hope that the agency will conduct a thorough review of its relationship with Stratus Consulting, including work contracted directly to the firm and its employees, as well as scientific studies published by the firm and its employees that the EPA has referenced to make any policy or support any regulatory actions.

Sincerely,



Daniel McGroarty  
President, American Resources Policy Network  
1701 Pennsylvania Ave NW, Suite 300  
Washington, DC 20009  
<http://americanresources.org/>

CC:

The Honorable Senator Ron Wyden  
Chairman, Senate Energy and Natural Resources Committee

The Honorable Senator Lisa Murkowski  
Ranking Member, Senate Energy and Natural Resources Committee

The Honorable Congressman Darrell Issa  
Chairman, House Oversight and Government Reform Committee

The Honorable Congressman Elijah Cummings  
Ranking Member, House Oversight and Government Reform Committee

The Honorable Congressman Lamar Smith  
Chairman, House Committee on Science, Space and Technology

The Honorable Congressman Eddie Bernice Johnson  
Ranking Member, House Committee on Science, Space and Technology

Mr. Bob Perciasepe  
Acting Administrator, Environmental Protection Agency

Ms. Gina McCarthy  
Assistant Administrator of the Office of Air and Radiation, Environmental Protection Agency

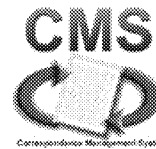
Ms. Nancy Sutley  
Chair, White House Council on Environmental Quality



# Correspondence Management System

Control Number: AX-13-000-5160

Printing Date: May 07, 2013 01:26:22



## Citizen Information

**Citizen/Originator:** Andersen, Ralph

Organization: Bristol Bay Native Association

Address: P.O. Box 310, Dillingham, AK 99576

**Constituent:** N/A

**Committee:** N/A

**Sub-Committee:** N/A

## Control Information

**Control Number:** AX-13-000-5160      **Alternate Number:** N/A  
**Status:** Pending      **Closed Date:** N/A  
**Due Date:** May 21, 2013      **# of Extensions:** 0  
**Letter Date:** May 3, 2013      **Received Date:** May 7, 2013  
**Addressee:** AAD-Acting Administrator      **Addressee Org:** EPA  
**Contact Type:** EML (E-Mail)      **Priority Code:** Normal  
**Signature:** DX-Direct Reply      **Signature Date:** N/A  
**File Code:** 404-141-02-01\_141\_a(2) Copy of Controlled and Major Correspondence Record of the EPA Administrator and other senior officials - Electronic.  
**Subject:** Daily Reading File - Please maintain 30 day comment period for Bristol Bay Assessment  
**Instructions:** DX-Respond directly to this citizen's questions, statements, or concerns  
**Instruction Note:** N/A  
**General Notes:** N/A  
**CC:** OEAE - Office of External Affairs and Environmental Education  
ORD - Office of Research and Development -- Immediate Office  
OW - Office of Water -- Immediate Office

## Lead Information

**Lead Author:** N/A

### Lead Assignments:

Assigner	Office	Assignee	Assigned Date	Due Date	Complete Date
Carla Veney	OEX	R10	May 7, 2013	May 21, 2013	N/A
<b>Instruction:</b> DX-Respond directly to this citizen's questions, statements, or concerns					

## Supporting Information

**Supporting Author:** N/A

### Supporting Assignments:

Assigner	Office	Assignee	Assigned Date
No Record Found.			

## History

Action By	Office	Action	Date
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# BRISTOL BAY NATIVE ASSOCIATION

P.O. BOX 310  
DILLINGHAM, ALASKA 99576  
PHONE (907) 842-5257

Tribal Councils  
Served by BBNA:

Aleknagik

Chignik Bay

Chignik Lagoon

Chignik Lake

Clarks Point

Curyung

Egegik

Ekuk

Ekwek

Igiugig

Iliamna

Ivanof Bay

Kanatak

King Salmon

Kokhanok

Koliganek

Levelock

Manokotak

Naknek

New Stuyahok

Newhalen

Nondalton

Pedro Bay

Perryville

Pilot Point

Port Heiden

Portage Creek

South Naknek

Togiak

Twin Hills

Ugashik

The Honorable Robert Perciasepe  
Acting Administrator  
US Environmental Protection Agency  
Ariel Rios Building  
1200 Pennsylvania Ave., N.W  
Mail Code 1101A  
Washington, DC 20460

Via email: [perciasepe.bob@epa.gov](mailto:perciasepe.bob@epa.gov)

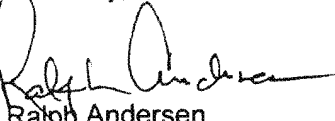
Re: Keep 30 day comment period for Bristol Bay Assessment

Dear Administrator Perciasepe:

Bristol Bay Native Association sincerely appreciates the effort the Environmental Protection Agency (EPA) invested in authoring the revised draft Bristol Bay Assessment and the agency's commitment to releasing the Assessment prior to the summer fishing season. This document is a significant achievement for EPA and the people of Bristol Bay. The Assessment will greatly assist the public, regional stakeholders and local, state and federal decision-makers to better understand the cultures, economies, and environments of our region and the threats that large scale mining would pose to those cultures, economies, and environments.

We strongly urge EPA to keep to the original 30-day public comment period for the Bristol Bay Assessment. A 30-day comment period ensures that EPA will maintain its schedule and commitment to the people of the region who are most impacted by the proposed Pebble mine. We believe, and as EPA has acknowledged, there has been extensive public comment and scientific peer review of the earlier draft. Extending the current comment period would adversely impact the people of the region. The current schedule is equitable for all parties who are now taking the opportunity to comment on this critical national issue and look forward to a final Bristol Bay Assessment as soon as possible. Thank you in advance for your consideration.

Sincerely,



Ralph Andersen  
President & CEO

Cc: Dennis McLerran, Regional Administrator, Region 10



# Correspondence Management System

Control Number: AX-13-000-5162

Printing Date: May 07, 2013 12:48:53



## Citizen Information

**Citizen/Originator:** Kovarovics, Scott

Organization: Izaak Walton League of America

Address: 707 Conservation Lane, Gaithersburg, MD 20878

**Constituent:** N/A

**Committee:** N/A

**Sub-Committee:** N/A

## Control Information

**Control Number:** AX-13-000-5162      **Alternate Number:** N/A  
**Status:** Pending      **Closed Date:** N/A  
**Due Date:** May 21, 2013      **# of Extensions:** 0  
**Letter Date:** May 3, 2013      **Received Date:** May 7, 2013  
**Addressee:** AAD-Acting Administrator      **Addressee Org:** EPA  
**Contact Type:** EML (E-Mail)      **Priority Code:** Normal  
**Signature:** DX-Direct Reply      **Signature Date:** N/A  
**File Code:** 404-141-02-01\_141\_a(2) Copy of Controlled and Major Correspondence Record of the EPA Administrator and other senior officials - Electronic.  
**Subject:** Daily Reading File - Please maintain comment period for Bristol Bay Watershed Assessment (Docket EPA-HQ-ORD-2013-0189)  
**Instructions:** DX-Respond directly to this citizen's questions, statements, or concerns  
**Instruction Note:** N/A  
**General Notes:** N/A  
**CC:** OEAE - Office of External Affairs and Environmental Education  
ORD - Office of Research and Development -- Immediate Office  
OW - Office of Water -- Immediate Office

## Lead Information

**Lead Author:** N/A

**Lead Assignments:**

Assigner	Office	Assignee	Assigned Date	Due Date	Complete Date
Carla Veney	OEX	R10	May 7, 2013	May 21, 2013	N/A
<b>Instruction:</b> DX-Respond directly to this citizen's questions, statements, or concerns					

## Supporting Information

**Supporting Author:** N/A

**Supporting Assignments:**

Assigner	Office	Assignee	Assigned Date
No Record Found.			

## History

Action By	Office	Action	Date
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Gaines, Cynthia

## DAILY READING FILE

**From:** Metzger, Philip  
**Sent:** Tuesday, May 07, 2013 8:23 AM  
**To:** Gaines, Cynthia  
**Subject:** Fw: Bristol Bay Comment Period

Philip C. Metzger  
Counselor to the Deputy Administrator  
U.S. Environmental Protection Agency  
(202) 564-3776

Sent by Blackberry

RECEIVED  
2013 MAY -7 AM 9:57  
OFFICE OF THE  
EXECUTIVE SECRETARIAT

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**From:** Philip Metzger on behalf of Bob Perciasepe  
**Sent:** Monday, May 06, 2013 6:07:17 PM  
**To:** Metzger, Philip  
**Subject:** Bristol Bay Comment Period

Bob Perciasepe  
Acting Administrator

(o) +1 202 564 4711  
(c) +1 202 368 8193

----- Forwarded by Philip Metzger/DC/USEPA/US on 05/06/2013 06:07 PM -----

From: Scott Kovarovich <[skovarovich@iwla.org](mailto:skovarovich@iwla.org)>  
To: Bob Perciasepe/DC/USEPA/US@EPA  
Date: 05/03/2013 11:54 AM  
Subject: Bristol Bay Comment Period

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The Honorable Robert Perciasepe  
Acting Administrator  
U.S. Environmental Protection Agency  
Ariel Rios Building  
1200 Pennsylvania Ave., N.W  
Mail Code 1101A  
Washington, DC 20460

Re: Maintain Announced 30 Day Comment Period for Bristol Bay Watershed Assessment (Docket # EPA-HQ-ORD-2013-0189)

Dear Administrator Perciasepe:

On behalf of the more than 41,000 Izaak Walton League members across the country, I strongly urge the EPA to maintain the announced 30-day public comment period for the Bristol Bay Watershed Assessment as described in the April 30, 2013 Federal Register notice. This comment period ensures that EPA will be able to maintain its schedule and commitment to the people of the region who are most impacted by the proposed Pebble Mine. We believe, and as EPA has acknowledged, there has been extensive public comment and scientific peer review of the earlier draft. Extending the current comment period would adversely impact the people of the region and further delay decisions that will impact a world-class fishery. Maintaining the current schedule is equitable for all parties who are commenting now and looking

forward to a final Watershed Assessment being issued as soon as possible.

Thank you in advance for your consideration.

Sincerely,

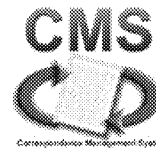
Scott Kovarovics  
Executive Director  
Conservation Director  
Izaak Walton League of America  
707 Conservation Lane  
Gaithersburg, MD 20878  
(301) 548-0150 ext. 223  
(301) 548-0146 (fax)  
[www.iwla.org](http://www.iwla.org)



# Correspondence Management System

Control Number: AX-13-000-5163

Printing Date: May 07, 2013 01:25:59



## Citizen Information

**Citizen/Originator:** Harsila, David

**Organization:** Alaska Independent Fishermen's Marketing Association  
**Address:** P.O. Box 60131, Seattle, WA 98160

**Constituent:** N/A

**Committee:** N/A **Sub-Committee:** N/A

## Control Information

**Control Number:** AX-13-000-5163 **Alternate Number:** N/A  
**Status:** Pending **Closed Date:** N/A  
**Due Date:** May 21, 2013 **# of Extensions:** 0  
**Letter Date:** May 7, 2013 **Received Date:** May 7, 2013  
**Addressee:** AAD-Acting Administrator **Addressee Org:** EPA  
**Contact Type:** EML (E-Mail) **Priority Code:** Normal  
**Signature:** DX-Direct Reply **Signature Date:** N/A  
**File Code:** 404-141-02-01\_141\_b Controlled and Major Corr. Record copy of the offices of Division Directors and other personnel.  
**Subject:** Daily Reading File-Keep the 30-day public comment period for the Bristol Bay Watershed Assessment that will ensure EPA will be able to maintain its schedule and commitment to the people who are most impacted by Pebble Mine  
**Instructions:** DX-Respond directly to this citizen's questions, statements, or concerns  
**Instruction Note:** N/A  
**General Notes:** N/A  
**CC:** OEAE - Office of External Affairs and Environmental Education  
OP - Office of Policy  
OW - Office of Water -- Immediate Office

## Lead Information

**Lead Author:** N/A

### Lead Assignments:

Assigner	Office	Assignee	Assigned Date	Due Date	Complete Date
Ken Labbe	OEX	R10	May 7, 2013	May 21, 2013	N/A
<b>Instruction:</b> DX-Respond directly to this citizen's questions, statements, or concerns					

## Supporting Information

**Supporting Author:** N/A

### Supporting Assignments:

Assigner	Office	Assignee	Assigned Date
No Record Found.			

## History

Gaines, Cynthia

**From:** Metzger, Philip  
**Sent:** Tuesday, May 07, 2013 8:23 AM  
**To:** Gaines, Cynthia  
**Subject:** Fw: Keep Bristol Bay Assessment Comment Period to 30 days

Philip C. Metzger  
Counselor to the Deputy Administrator  
U.S. Environmental Protection Agency  
(202) 564-3776

Sent by Blackberry

RECEIVED  
2013 MAY -7 AM 9:56  
OFFICE OF THE  
EXECUTIVE SECRETARIAT

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**From:** Philip Metzger on behalf of Bob Perciasepe  
**Sent:** Monday, May 06, 2013 6:07:47 PM  
**To:** Metzger, Philip  
**Subject:** Keep Bristol Bay Assessment Comment Period to 30 days

Bob Perciasepe  
Acting Administrator

(o) +1 202 564 4711  
(c) +1 202 368 8193

----- Forwarded by Philip Metzger/DC/USEPA/US on 05/06/2013 06:07 PM -----

From: "AIFMA \Harsilay)" <aifma1@seanet.com>  
To: Bob Perciasepe/DC/USEPA/US@EPA  
Date: 05/03/2013 02:16 PM  
Subject: Keep Bristol Bay Assessment Comment Period to 30 days

---

The Honorable Robert Perciasepe  
Acting Administrator  
US Environmental Protection Agency  
Ariel Rios Building  
1200 Pennsylvania Ave., N.W  
Mail Code 1101A  
Washington, DC 20460

Dear Administrator Perciasepe:

We strongly urge you to keep to the announced 30-day public comment period for the Bristol Bay Watershed Assessment as described in the April 30, 2013 Federal Register. The 30 day comment period ensures that EPA will be able to maintain its schedule and

commitment to the people of the region who are most impacted by the proposed Pebble Mine.

We believe, and as EPA has acknowledged, there has been time for extensive public comment and scientific peer review of the earlier draft. Furthermore, in the next 30 days the Bristol Bay commercial fishermen, whom we represent, will be going off-line and heading to the fishing grounds in Bristol Bay to prepare for the upcoming Salmon Season. They will not be able to participate in the process from the fishing grounds. However, Pebble mine proponents will undoubtedly benefit from having more time.

Keeping to the current schedule is equitable for all parties who are now taking the opportunity to comment on this critical national issue. We look forward to a final Watershed Assessment being published as soon as possible. Thank you in advance for your consideration.

Regards,

David Harsila,  
President  
Alaska Independent Fishermen's Marketing Association

AIFMA (Alaska Independent Fishermen's Marketing Assoc.)  
P.O. Box 60131  
Seattle, WA 98160  
PH/FAX (206) 542-3930  
[www.aifma.org](http://www.aifma.org)

*Representing the interests of Bristol Bay, Alaska salmon fishermen since 1966.*

## **Nonresponsive Correspondence unrelated to Pebble/Bristol Bay**

## **Nonresponsive Correspondence unrelated to Pebble/Bristol Bay**

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## **Nonresponsive Correspondence unrelated to Pebble/Bristol Bay**

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